

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

C.B.,
Appellant-Plaintiff,

v.

NASEEB INVESTMENTS, INC.,
Appellee-Defendant.

Appeal from the United States District Court
for the Northern District of Georgia
Case No. 1:20-cv-04213-AT

**RESPONSE OF APPELLEE TO MOTION OF INTERNATIONAL
FRANCHISE ASSOCIATION FOR LEAVE
TO FILE AN *AMICUS CURIAE* BRIEF**

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Certificate of Interested Persons & Corporate Disclosure Statement

In accordance with Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rules 26.1-1 through 26.1-3, counsel for Appellee-Defendant Naseeb Investments, Inc. certifies that the Certificate of Interested Persons contained in the International Franchise Association's Motion for Leave to File Brief of Amicus Curiae is complete.

Submitted this April 9, 2025.

/s/ Laurie Webb Daniel

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Appellee-Defendant Naseeb Investments, Inc. (“Naseeb”) responds to the pending motion of the International Franchise Association (“IFA”) to file an *amicus curiae* brief as follows.

Naseeb does not disagree with the analysis in the IFA’s proposed *amicus curiae* brief, but observes that it is largely redundant. And when not repeating the points made in Naseeb’s Appellee brief, it strays into issues not needed for the resolution of the present appeal. The law applicable to this case is straightforward, established by binding Circuit precedent, *Doe #1 v. Red Roof Inns, Inc.*, 21 F.4th 714, 719 (11th Cir. 2021), as further explained in *K. H. v. Riti, Inc.*, 2024 WL 505063, at *3 (11th Cir. Feb. 9, 2024). As in *K.H.*, the district court’s order here should be affirmed under the framework required by *Red Roof* without the need for extra pages or even oral argument. Accordingly, while Naseeb appreciates the IFA’s interest in this case, it respectfully submits that there is no need to burden the Court and C.B.’s counsel with additional briefing from a non-party.

Respectfully submitted this April 9, 2025.

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CERTIFICATE OF COMPLIANCE

1. This brief complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because it contains 174 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(f).

2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6), because it has been prepared in a proportionally spaced typeface using Times New Roman 14-point font.

This April 9, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2025, I electronically filed the foregoing with the Clerk of Court for the United States Court of Appeals for the Eleventh Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Laurie Webb Daniel

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